

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	No. 4:20 CR00805 HEA/PLC
	)	
THOMAS TAYLOR,	)	
	)	
Defendant.	)	
	)	

**DEFENDANT'S FIFTH MOTION FOR ADDITIONAL TIME IN WHICH  
TO FILE PRETRIAL MOTIONS**

COMES NOW defendant, Thomas Taylor, by and through counsel, Assistant Federal Public Defender Tara Crane, and moves this Court to grant additional time in which to file pretrial motions. In support of this motion, counsel states the following:

1. The date for filing pretrial motions is July 28, 2021.
2. Counsel needs additional time to further investigate this case and discuss this matter with the defendant who is currently housed in the Jefferson County Jail.
3. Additionally, counsel has had discussions with the government regarding a potential disposition in this case. Counsel requests additional time to complete these discussions to determine if a resolution can be reached that would negate the need for pretrial motions to be filed.
4. A continuance in this matter is in the interest of justice as it allows reasonable time for counsel to be properly prepared pursuant to 18 U.S.C. §3161. If the Court grants this request, counsel asks for up to and including 30 days in which to file pretrial motions.

WHEREFORE, for the reasons stated above, counsel requests an extension of time, up to and including 30 days, in which to file pretrial motions with the Court.

Respectfully submitted,

/s/ Tara Crane  
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ATTORNEY FOR DEFENDANT

### **CERTIFICATE OF SERVICE**

I hereby certify that on July 28, 2021, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Donald Boyce, Assistant United States Attorney.

/s/Tara Crane  
TARA CRANE  
Assistant Federal Public Defender